

Ronald H. Reynolds (NV SB No. 827)  
Matthew M. Reynolds (NV SB No. 12268)  
REYNOLDS & ASSOCIATES  
823 Las Vegas Blvd. So., Suite 280  
Las Vegas, NV 89101  
Phone: (702) 445-7000  
Fax: (702) 385-7743  
Email: [ron@reynoldslawyers.com](mailto:ron@reynoldslawyers.com)  
[mac@reynoldslawyers.com](mailto:mac@reynoldslawyers.com)

**Attorneys for Plaintiff**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**JOE HAND PROMOTIONS, INC.,**

**Plaintiff,**

**vs.**

**EDEN J. STEAK LLC, DBA GEISHA  
STEAK HOUSE AKA GEISHA HOUSE;  
DONGHWAN PARK, INDIVIDUALLY  
AND DBA GEISHA STEAK HOUSE AKA  
GEISHA HOUSE, AND ALBERT S. LEE,  
INDIVIDUALLY AND DBA GEISHA  
STEAK HOUSE AKA GEISHA HOUSE,**

**Defendant.**

**Case No.: 2:12-cv-01930-LRH-PAL**

**STIPULATED DISCOVERY PLAN AND  
SCHEDULING ORDER**

The parties hereto, through their respective counsel, hereby submit the following proposed Stipulated Discovery Plan and Scheduling Order pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 26-1.

**1. Conference:** Pursuant to Federal Rule of Civil Procedure 26(f), counsel for the parties conferred telephonically on January 11, 2013. As required, during this conference counsel considered the nature and basis of their clients' claims and defenses and the possibility of prompt settlement of this action. Counsel discussed the timing and other arrangements pertaining to the initial disclosures required by Rule 26(a)(1), discussed issues concerning preservation of discoverable information and developed a proposed discovery plan.

1           **2.     Discovery Plan:**

2                   A.     Initial Disclosures: Pursuant to Rule 26(a)(1)(C), and by  
3                   agreement of the parties, the parties will exchange initial disclosures no later than  
4                   January 25, 2013.

5                   B.     Areas of Discovery: Discovery will be needed to address all  
6                   issues, including all claims and defenses within the scope of the parties'  
7                   pleadings.

8                   C.     Discovery Cut-Off Date: The parties propose a discovery cutoff  
9                   date of May 27, 2013, which is one hundred and twenty (120) days following the  
10                  parties' proposed deadline for serving initial disclosures.

11                  D.     Amendments to Pleadings and Addition of Parties: Pursuant to  
12                  Local Rule 26-1(e)(2), the parties shall have until February 25, 2013, to file any  
13                  motions to amend the pleadings or to add parties. This date is ninety (90) days  
14                  before the parties' proposed discovery cut-off date.

15                  E.     Federal Rule of Civil Procedure 26(a)(2) Expert Disclosures:  
16                  Disclosure of experts shall be made no later than March 26, 2013, which is the  
17                  next closest day to sixty (60) days before the parties' proposed discovery cut-off  
18                  date. Disclosures of any rebuttal experts shall be made no later than April 25  
19                  2013, which is within thirty (30) days after the parties' initial disclosure of  
20                  experts.

21                  F.     Interim Status Report: Pursuant to Local Rule 26-3, the parties  
22                  shall submit an interim status report no later than March 26, 2013, which is the  
23                  next closest day to sixty (60) days before the parties' proposed discovery cut-off  
24                  date.

1                   G.     Dispositive Motions: Pursuant to Local Rule 26-1(e)(4), the  
 2 parties shall have until June 24, 2013 to file dispositive motions. The date is  
 3 within thirty (30) days after the parties' proposed discovery cut-off date.

4                   H.     Pretrial Order: Pursuant to Local Rule 26-1(e)(5), the joint pretrial  
 5 order shall be filed by July 24, 2013. This date is within thirty (30) days after the  
 6 deadline for filing dispositive motions. In the event that dispositive motions are  
 7 filed, the date for filing the joint pretrial order shall be suspended until thirty (30)  
 8 days after decision on such motion(s) or further order of the Court. The  
 9 disclosures required by Federal Rule of Civil Procedure 26(a)(3), and any  
 10 objections thereto, shall be made in the joint pretrial order.

11                   **3.     Limitations on Discovery**: At this time, the parties propose no changes to the  
 12 form or scope of discovery imposed by the Federal Rules of Civil Procedure or the Local Rules,  
 13 other than the extension of certain deadlines as noted above. The parties, however, reserve their  
 14 right to seek changes to the limitations on the form or scope of discovery, as and if necessary, at  
 15 a later date.

16                   **4.     Court Conference**: The parties do not believe that a conference is necessary,  
 17 unless the Court feels it would be useful to hear from the parties with respect to their proposed  
 18 scheduling plan.

19 DATED: January 14, 2013

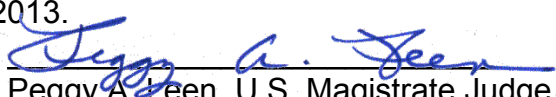
20 **REYNOLDS & ASSOCIATES**

21     /s/ Matthew M. Reynolds  
 22 MATTHEW REYNOLDS, NV Bar 12268  
 23 [mac@reynoldslawyers.com](mailto:mac@reynoldslawyers.com)  
 24 823 Las Vegas Blvd. South, Suite 280  
 25 Las Vegas, NV 89101  
 26 Attorney for Plaintiff

**COHEN-JOHNSON LLC**

/s/ H. Stan Johnson, Esq.  
 H. STAN JOHNSON, NV Bar 265  
[sjohnson@cohenjohnson.com](mailto:sjohnson@cohenjohnson.com)  
 255 E. Warm Springs Rd., Suite 100  
 Las Vegas, NV 89119  
 Attorney for Defendants

27 IT IS SO ORDERED this 14th day of January, 2013.

28   
 Peggy A. Zeen, U.S. Magistrate Judge